CSM Legal, P.C. Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165 ramsha@csm-legal.com Telephone: (212) 317-1200 Facsimile: (212) 317-1620

August 9, 2022

VIA ECF

Honorable Jesse M. Furman United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: Cervantes et al v. ANDR Services Group Inc et al

Index No. 21-cv-08099-JMF

Your Honor:

This office represents Plaintiffs in the above captioned matter. This letter is written jointly with Defendants to respectfully request an extension of time to complete discovery from August 12, 2022 to October 11, 2022 and subsequently an adjournment of the pre-trial conference from August 18, 2022 to October 17, 2022.

Additionally, we have been advised by counsel for the Defendants that one of the Defendants, Thomas Pepe is presently incarcerated due to certain New York State crime(s). Mr. Pepe is expected to be released within the next thirty (30) days. Mr. Pepe's participation in discovery will be essential for this matter to proceed.

Counsel for Defendants consents to this request.

This is the first such request.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Ramsha Ansari Ramsha Ansari, Esq.

cc: All counsel (VIA ECF)

Application GRANTED. The pre-trial conference will be adjourned to **October 20, 2022, at 4 pm**. The Clerk of Court is directed to terminate ECF No. 89. SO ORDERED.

August 9, 2022